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Fabricators Pension Trust Fund*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * * * *

BOARD OF TRUSTEES OF THE
SOUTHERN NEVADA GLAZIERS
AND FABRICATOR PENSION TRUST
FUND,

Plaintiff,

vs.

HEINAMAN CONTRACT GLAZING,
INC., a California corporation; JOHN L.
HEINAMAN, an individual; TOM T.
HOWHANNESIAN, an individual; RICK
K. DONATH, an individual; VERONICA
BOWEN, an individual; ISABELLE
LOHRKE, an individual; JOHN DOES I-
XX, inclusive; and ROE ENTITIES I-XX,
inclusive,

Defendants.

CASE NO.: 2:17-cv-01330-JAD-GWF

**STIPULATION TO EXTEND TIME
TO FILE RESPONSIVE PLEADING**

[First Request]

Date: N/A
Time: N/A

The Plaintiff, BOARD OF TRUSTEES OF THE SOUTHERN NEVADA
GLAZIERS AND FABRICATORS PENSION TRUST FUND (“Plaintiff”), and
Defendants HEINAMAN CONTRACT GLAZING, INC., JOHN L. HEINAMAN, TOM
T. HOWHANNESIAN, RICK K. DONATH, and VERONICA BOWEN
 (“Defendants”), each acting by and through their undersigned counsel, hereby stipulate
and agree as follows:

1. Defendants Heinaman Contract Glazing, Inc., John L. Heinaman, and Tom

1 T. Howhannesian have received a copy of the Summons and Complaint and agree to save
2 the expense of formal service. Heinaman Contract Glazing, Inc., John L. Heinaman, and
3 Tom T. Howhannesian understand that they retain all defenses to the lawsuit, the Court's
4 jurisdiction, and the venue of the action, but that they waive any objections to service.
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6 2. Defendants Heinaman Contract Glazing, Inc., John L. Heinaman, Tom T.
7 Howhannesian, Rick K. Donath, and Veronica Bowen shall have thirty (30) days from
8 the date of filing this Stipulation to file an answer or responsive pleading.
9

10 3. This is the first request to extend time to file an answer or responsive
11 pleading for these Defendants. The reason for the extension requested is to allow the
12 parties time to informally exchange documents and discuss resolution of this matter.
13

14 DATED this 9th day of August, 2017.

15 CHRISTENSEN JAMES & MARTIN

16 By: /s/ Wesley J. Smith
17 Wesley J. Smith, Esq.
18 *Attorneys for Plaintiff Board of Trustees*
19 *of the Southern Nevada Glaziers and*
20 *Fabricators Pension Trust Fund*

SHULMAN HODGES & BASTIAN, LLP

By: /s/ James C. Bastian
James C. Bastian, Esq.
Attorneys for Defendants Heinaman
Contract Glazing, Inc., John L.
Heinaman, Tom T. Howhannesian, Rick
K. Donath, and Veronica Bowen

21 IT IS SO ORDERED:

22 
UNITED STATES MAGISTRATE JUDGE

23 DATED: 8/10/2017
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